



**U.S. Department of Justice**

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June 23, 2017

The Honorable James K. Bredar  
United States District Judge  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: United States v. Gerald Johnson et al., JKB-16-363

Dear Judge Bredar,

We write to update the Court as to the status of discovery in the above-captioned case. Earlier today, we produced to defense counsel photo arrays, photo books, and related materials pertaining to witnesses who testified in the state trials of David Hunter, Gerald Johnson, Wesley Brown, and Kenneth Jones. Pursuant to the Court's amended scheduling order, as well as its instructions during the in-court discovery hearing on June 5, we are disclosing information pertaining to *all* witnesses who (i) testified during the state trials referenced above, and (ii) were presented with photo arrays or photo books by state investigators. We are *not*, by virtue of this production, making any representations as to whether these witnesses will testify in this federal case. Nor are we disclosing materials generated during interviews by federal investigators in 2016 and 2017. Disclosing these materials, which were not produced in the prior state cases, will signal to the defendants and their counsel which state witnesses are cooperating with (or will testify during) this federal case.

We also wish to notify the Court that our paralegal, Damon Gasque, has successfully created a database that will allow defense counsel to search "across" the contents of prior discovery productions, without having to open individual .pdfs. We have included that database, as well instructions for using it, with the contents of our production today.

In addition, we have ordered the transcription of all witness testimony presented during the state trials of Gerald Johnson and Wesley Brown. (As the Court knows, we have already produced video recordings of both proceedings). We will produce completed transcripts to all defense counsel as soon as they are available.

Finally, we anticipate producing all materials associated with the arrest of Marquise McCants sometime next week, and in no event later than July 5, 2017.

Very truly yours,

STEPHEN M. SCHENNING  
Acting United States Attorney

By: /s/  
Peter J. Martinez  
Christina A. Hoffman  
Assistant United States Attorneys